



United States Department of Justice

United States Attorney
Northern District of New York

100 South Clinton Street, P.O. Box 7198
James M. Hanley Federal Building
Syracuse, New York 13261-7198

Tel.: (315) 448-0672
Fax: (315) 448-0658

April 10, 2025

Hon. Daniel J. Stewart
U.S. Magistrate Judge
James T. Foley U.S. Courthouse
445 Broadway, Room 314
Albany, New York 12207

Re: *Real Property Commonly Known as 600 Linkhorn Drive, Virginia Beach, VA 23451, et al.*, Civil Action No. 1:24-cv-1345 (MAD/DJS)

Dear Judge Stewart:

Pursuant to Local Rule 7.1(a)(2), the United States respectfully requests the opportunity to reply to the response filed by B and R Acquisition Partners, LLC and JHM Lending Ventures, LLC (Dkt. No 49), to the United States' letter requesting a post-seizure hearing (Dkt. No. 47).

Respectfully submitted,

JOHN A. SARCONI III
United States Attorney

By: /s/ Elizabeth A. Conger
Elizabeth A. Conger
Assistant United States Attorney
Bar Roll No. 520872

cc: M. Patrick Everman, via ECF
Rankin S. Fortenberry, via ECF